

U.S. Pat. App. No. 10/752,786

RESPONSEI. The Specification Objection

The objection to the Specification has been addressed.

II. The 35 U.S.C. §102 Rejections

Claims 1-31 were rejected under 35 U.S.C. §102(b) as being allegedly anticipated by U.S. Patent Application Publication No. 2002/0193975 to Zimmerman ("ZIMMERMAN"). Applicant respectfully traverses the rejections.

It is axiomatic that an anticipating reference must disclose every element of the rejected claim.

A. Claim 1

Claim 1 recites a method for assisting navigation of digital content using a tangible medium, comprising:

receiving an instruction to access digital content corresponding to a portion of a tangible medium:

said medium being readable by a user-positionable input device, and  
said digital content being accessible from a stored file;

determining and accessing stored digital content corresponding to said input device's instantaneous position on said tangible medium; and  
enabling electronic navigation of said digital content including enabling toggling between browsing of said tangible medium and browsing of said digital content on a computer screen using said input device, said browsing of said digital content being performed using an input device without necessarily involving said tangible medium.

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1. ZIMMERMAN Failed to Disclose or Suggest the Step of Enabling a User to Browse Digital Content Using an Input Device without Necessarily Involving Said Tangible Medium

Claim 1 has been amended to recite the limitation of browsing said digital content using an input device without necessarily involving the tangible medium. This amended limitation has support on at least pages 4, 8, 14 and 17 of the Specification<sup>1</sup>.

ZIMMERMAN discloses a method to manipulate electronic media by manipulating off-line media. ZIMMERMAN, paragraph 22. Further, ZIMMERMAN discloses accessing pre-determined digital content by pointing a probe to various portions of a printed medium. In ZIMMERMAN, digital content to be retrieved and presented to a user are predetermined content previously associated with specific portions on the printed medium. Thus, a user in ZIMMERMAN does not have any free choice to browse the digital content (e.g., make translational movements, rotational movements, etc.).

ZIMMERMAN does disclose a zooming capability by turning a knob on the probe while pointing the probe to a specific portion on the printed medium. See ZIMMERMAN paragraphs [0081] and [0082]. Here again, the user does not have any free choice of "how" to browse the digital content. In addition, the printed medium in ZIMMERMAN has to be used at all times to affect digital content access.

In contrast, claim 1 recites a method that enables a user to toggle to a digital content browsing mode wherein the user can browse digital content without necessarily involving the tangible medium. Further, while in the digital content browsing mode, the user has free choice as to "how" he wishes to browse the content (e.g., make translational movements, rotational movements, etc.). A separate input device can be

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<sup>1</sup> The Specification explicitly describes enabling the user to use any input device, which may be a separate device from the one being used to browse the tangible medium, to browse digital content. See Specification page 8, paragraph 3, and page 17, paragraph 3 ("The user may use a separate input device which allows better movement control when navigating in a three-dimensional digital environment"). Thus, the Specification at least implicitly describes browsing digital content without necessarily involving the tangible medium.

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used to effectively browse digital content. Digital browsing mode can be initiated by toggling from tangible medium browsing mode to digital content browsing mode.

Based on the foregoing, Applicant respectfully submits that ZIMMERMAN does not anticipate claim 1 which is now in condition for allowance.

B. Claims 2-21 & 23-24

Claims 2-24 are dependent on claim 1. Based on the foregoing arguments regarding claim 1, these dependent claims should also be in condition for allowance. Claim 22 has been canceled.

C. Independent Claims 25, 28, 29 and 32

Independent claims 25, 28, 29 & 32 include similar limitations as discussed above regarding claim 1. Thus, based on the foregoing arguments regarding claim 1, these claims should also be in condition for allowance.

D. Claims 26-27 & 30-31

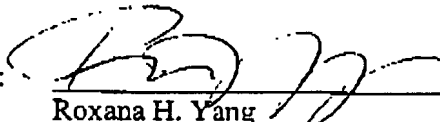
Claims 26-27 & 30-31 are dependent on claims 25 and 29, respectively. Based on the foregoing regarding claims 25 & 29, these dependent claims should also be in condition for allowance.

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III. Conclusion

In view of the foregoing, it is respectfully submitted that the application is now in condition for allowance. Should the Examiner believe that a telephone interview would help advance the prosecution of this case, the Examiner is requested to contact the undersigned attorney.

Respectfully submitted,

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